

1 Rene L. Valladares
Federal Public Defender
2 Nevada Bar No. 11479
Madeline S. Lal
3 Assistant Federal Public Defender
Madeline_Nelson@fd.org
4 411 E. Bonneville Ave., Ste. 250
Las Vegas, NV 89101
5 (702) 388-6577
(702) 388-5819 (fax)

6 Attorney for Demecia Shontres Washington

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 United States of America,
11 Plaintiff,

12 v.

13 Demecia Shontres Washington,
14 Defendant.

Case No. 2:18-cr-00384-APG-EJY

**Stipulation to Extend Deadline
In Second Amended General
Order 2023-09 By Thirty (30)
Days**

15
16 The United States of America, by Assistant United States Attorney Jim W.
Fang, and Defendant Demecia Shontres Washington, by Assistant Federal Public
17 Defender Madeline S. Lal, submit the following Stipulation to extend, by thirty (30)
18 days, the deadline set in Second Amended General Order 2023-09.

19 The parties agree and stipulate to the following:

20 1. On November 17, 2021, this Court sentenced Ms. Washington to 216
21 months' incarceration. ECF No. 162.

22 2. On April 23, 2024, Ms. Washington filed a *pro se* motion for a reduction
23 of sentence pursuant to 18 U.S.C. § 3582(c)(2) in light of Sentencing Guidelines
Amendment 821. ECF No. 194.

1 3. Second Amended General Order 2023-09 presumptively appoints the
2 Office of the Federal Public Defender, District of Nevada ("FPD") to represent any
3 defendant previously determined to have been entitled to appointment of counsel, or
4 who is now entitled to appointment of counsel to determine whether that defendant
5 may qualify for retroactive relief under Amendment 821, and to present any
6 requests relating thereto to the Court for adjudication that the FPD deems
7 appropriate under 821. Under Second Amended General Order 2023-09, the FPD
8 must file, within 30 days of a *pro se* motion or letter, a contested motion, a joint
stipulation for a sentence reduction, or a notice of non-eligibility.

9 4. The parties are seeking additional time to review Ms. Washington's
10 case and determine his eligibility for a reduction of sentence.

11 5. For the reasons stated above, the parties respectfully request that the
12 Court issue an order extending the 30-day deadline set by Second Amended General
Order 2023-09, by thirty (30) days.

13 Dated: May 22, 2024

14
15 RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

16
17 By Madeline S. Lal
18 MADELINE S. LAL
Assistant Federal Public Defender

By Jim W. Fang
JIM W. FANG
Assistant United States Attorney

19
20 IT IS SO ORDERED:

21 Dated: May 23, 2024

22 
23 ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE